

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

08 MAY -1 AM 9:56

'08 MJ1366

UNITED STATES OF AMERICA )

v. )

ABALOS, Glenda Castillo )

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Magistrate's Case No.

COMPLAINT FOR VIOLATION OF

21 U.S.C. §§ 841 Possession of a

Controlled Substance with Intent to Distribute;

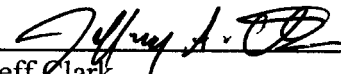
The undersigned complainant being duly sworn states:

That on or about April 30, 2008, within the Southern District of California, defendants:


Glenda Castillo ABALOS

did knowingly and intentionally possess, with intent to distribute, approximately 114.57 kilograms of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

  
Jeff Clark  
Special Agent  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence, May 1, 2008.

  
The Honorable Nita Stormes  
United States Magistrate Judge

### PROBABLE CAUSE STATEMENT

I, Special Agent Jeff Clark, declare under penalty of perjury the following statement is true and correct:

On April 30, 2008 Border Patrol Douglas Dyson and Canine Lea (120720) were assigned to the Interstate 8 Checkpoint. At approximately 5:56 AM, while working in the pre-primary inspection area, a red Dodge Stratus approached the checkpoint. At this time BPA Dyson observed an alert from his canine partner Lea. BPA Dyson instructed the primary agent, Border Patrol Agent Greg Magrath to send the vehicle to the secondary for further inspection. Once in secondary, the vehicle was parked and the driver later identified as ABALOS, Glenda was asked to step out of the vehicle. She was then asked to stand next to the freeway railing near the checkpoint office. Agent Dyson then conducted a canine sniff of the vehicle, and again received an alert and indication from his canine partner Lea to the trunk of the vehicle.

Agent Dyson and Canine Lea are trained and certified in the detection of the odors of marijuana, cocaine, heroine, methamphetamines and their derivatives as well as the odor of concealed people.

Agent Dyson requested and was granted consent from ABALOS to hand search the interior of the vehicle including the trunk. Agent Dyson opened the trunk utilizing the vehicle's key and observed multiple "bricks" wrapped in plastic and brown cellophane packing tape. This type of packaging is consistent with the typical methods of packaging utilized by contraband smugglers. ABALOS was arrested for contraband smuggling was taken inside the checkpoint for further processing.

The contraband was then taken into the checkpoint to be inventoried, weighed and logged in as evidence. The total number of bricks was 25 with a gross weight of 252.59 pounds. The contraband was logged onto CBP form 6051S (Serial # 3463378).

A sample of one of the bricks was tested utilizing a Narkit Jr. Field Narcotics identification test kit. The sample tested positive for the properties and characteristics of marijuana.

SA Clark advised ABALOS of her Miranda Rights, as witnessed by SA Bell, using a DEA 13A card. ABALOS said that she understood her rights and was not willing to answer any questions without a lawyer present.